

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Brittani Williams,)	
)	
Plaintiff,)	
)	
v.)	Civil Action File No:
)	1:20-cv-0186-JPB
)	
Levon Allen in his official capacity)	
as the Sheriff of Clayton County)	
Georgia,)	
)	
Defendant.)	

**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO
BRING TECHNOLOGY INTO THE COURTHOUSE**

COMES NOW the undersigned attorneys for Defendant Levon Allen in his official capacity as the Sheriff of Clayton County, Georgia and move for leave to bring technology (including cellular phones) into the courthouse for purposes of the jury trial before Hon. J.P. Boulee beginning at 9:00 a.m. on May 16, 2023 and continuation through the duration of the trial. Specifically, Defendant respectfully asks the Court for leave for the following individuals to bring in their respective electronics (including cellular phones) into Courtroom 1908:

- (1) Jill R. Hanke, paralegal assisting with the Defendant's defense seeks leave to bring her (1) iPad, (2) laptop computer, (3) cellphone, and/or (4) accompanying cords, powerstrips, speakers, and/or adaptors;
 - (2) Jack Hancock, attorney for Defendant, seeks leave to bring his cell phone;
 - (3) Derrick Farmer, identified as a witness for Defendant and Plaintiff, seeks leave to bring his cell phone;
 - (4) David Ware, Esq., attorney for Mr. Farmer, seeks to leave bring his cell phone;
 - (5) Rajaunda Hardnett, identified as a witness for Defendant and Plaintiff, seeks leave to bring her cell phone;
 - (6) Tyrentheus Ray, identified as a witness for Defendant and Plaintiff, seeks leave to bring his cell phone;
 - (7) Pam Ambles, identified as a witness for Defendant and Plaintiff, seeks leave to bring her cell phone;
 - (8) Richard Moen, identified as a witness for Defendant and Plaintiff, seeks leave to bring his cell phone;
 - (9) Sheriff Levon Allen, Defendant, seeks leave to bring his cell phone;
- and

(10) Major Ronnae Tolbert, the Clayton County Sheriff's Office representative at trial, seeks leave to bring his cell phone.

A proposed Order is enclosed for the Court's review.

This 9th day of May, 2023.

FREEMAN MATHIS & GARY, LLP

/s/ Kirsten S. Daughdril

John D. Bennett

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CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Local Rule 7.1(D), that the foregoing
**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO BRING
TECHNOLOGY INTO THE COURTHOUSE** has been prepared in accordance
with Local Rule 5.1(C) (Times New Roman font, 14 point.)

FREEMAN MATHIS & GARY, LLP

*/s/ Kirsten S. Daughdril*_____

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO BRING TECHNOLOGY INTO THE COURTHOUSE** with the Clerk of Court using the CM/ECF system which will automatically serve an electronic notification and copy of such filing to all attorneys of record in this matter.

This 9th day of May, 2023.

FREEMAN MATHIS & GARY, LLP

/s/ Kirsten S. Daughdril
John D. Bennett
Georgia Bar No. 059212
Kirsten S. Daughdril
Georgia Bar No. 633350

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